UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

WESLEY CAMERON,)	
Plaintiff,)	C.A. No. 1:21-cv-11758-IT
v.)	
SAKS & COMPANY LLC)	
Defendant.)	
)	

LOCAL RULE 16.1 JOINT STATEMENT

Pursuant to Rules 16 and 26 of the Federal Rules of Civil Procedure and Local Rules 16.1 and 26.1 of the United States District Court for the District of Massachusetts, as well as the Court's December 6, 2021 Order (Doc. No. 11), the parties hereby submit this Joint Statement.

I. <u>Joint Discovery Plan and Filing of Motions.</u>

The parties propose the following joint discovery plan and schedule for filing motions:

- 1. Initial Disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure shall be served by <u>February 1, 2022</u>.
- 2. Initial interrogatories pursuant to Rule 33 of the Federal Rules of Civil Procedure and requests for production pursuant to Rule 34 of the Federal Rules of Civil Procedure shall be served no later than May 1, 2022.
 - 3. Fact depositions shall be completed by <u>August 1, 2022</u>.
- 4. Plaintiff shall identify any expert witnesses pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure by June 1, 2022.
- 5. Defendant shall identify any expert witnesses pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure by <u>July 1, 2022</u>.

- 6. All expert depositions shall be completed by <u>August 1, 2022</u>.
- 7. Discovery shall be completed by <u>August 1, 2022</u>.
- 8. All dispositive motions, including motions for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure, shall be filed (1) by <u>September 1, 2022</u>, with any opposition filed by <u>October 1, 2022</u>, or (2) not later than 30 days after compliance by any party who is ordered to act in accordance with any Order the Court issues pursuant to Rule 37 of the Federal Rules of Civil Procedure, whichever is later.

II. Other Issues.

The Court's December 6, 2021 Order (Doc. No. 11) states: "In addition [to the foregoing], the joint statement shall list all pending motions and shall also identify any matters that need to be discussed at the scheduling conference." The parties respectfully state (1) there are no pending motions, and (2) no other matters exist that need to be discussed at the scheduling conference (in which case, cancellation of the scheduling conference may be appropriate). The Order also states: "The parties' joint statement shall indicate whether all parties consent to reassignment of the case to a magistrate judge for all purposes." The parties respectfully state they do not consent to such reassignment.

III. <u>Certifications.</u>

The parties have conferred with their clients as to establishing a budget or cost for the litigation with respect to ADR programs. Certifications will be provided by independently, within five days of the filing of this Joint Statement.

Dated: December 23, 2021

Respectfully submitted, Respectfully submitted,

PLAINTIFF DEFENDANT

WESLEY CAMERON SAKS & COMPANY LLC

By His Attorney, By Its Attorney,

/s/Mitchell J. Notis /s/ Jeffrey A. Fritz

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CERTIFICATION

The undersigned hereby certifies a true and accurate copy of the foregoing document was filed using the Court's CM/ECF system on December 23, 2021, and that the Court's CM/ECF system will electronically notify all parties of record.

/s/ Jeffrey A. Fritz
Jeffrey A. Fritz